

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN OF GEORGIA
ATLANTA DIVISION

NATALIA SUTHERLAND and)	
MARIA SUTHERLAND, as)	
Surviving Children of ANDREW)	
REED SUTHERLAND, Decedent,)	
)	CIVIL ACTION FILE
Plaintiffs,)	
)	NO. 1:23-CV-01829-VMC
v.)	
)	
BUTTS COUNTY, GEORGIA,)	
et al.,)	
)	
Defendants.)	

CONSENT MOTION TO EXTEND TIME WITHIN
WHICH BUTTS COUNTY DEFENDANTS
MAY ANSWER PLAINTIFFS' COMPLAINT

COME NOW Plaintiffs NATALIA SUTHERLAND and MARIA SUTHERLAND, and Defendants BUTTS COUNTY, GEORGIA, BUTTS COUNTY SHERIFF'S OFFICE, GARY LONG, JOSEPH MANNING, ANTHONY DUPREE, TERRY SMITH, EMMETT LEWIS, KALEB HILL, CALEB BROOKS, BRANDON BOYD, CHRISTIN MILLER, ANTONIO LEE and CONSTANCE ADAMS ("Butts County Defendants") and, pursuant to Fed.R.Civ.P. 6(b)(1), jointly file this Consent Motion to Extend Time Within Which Defendants May Answer Plaintiffs' Complaint as follows:

1.

Plaintiffs filed their Complaint in this Court on April 21, 2023, and have

had these Defendants properly served on various dates. Defendants anticipate serving an Answer and Defenses to the Complaint.

2.

So that an Answer may be jointly filed and for other reasons, Plaintiffs consent to an extension by up to and including June 5, 2023 for these Defendants to serve an Answer to Plaintiffs' Complaint, without waiver or default of any kind.

THEREFORE, Plaintiffs and Butts County Defendants respectfully request that the Court inquire into this matter and grant the parties' request to extend the time within which the Butts County Defendants may serve their Answer, up to and including June 5, 2023.

Respectfully submitted this 16th day of May, 2023.

WILLIAMS & WAYMIRE, LLC

/s/ Terry E. Williams
TERRY E. WILLIAMS
Georgia Bar No. 764330
Attorney for Butts County Dfts

Building 400, Suite A
4330 South Lee Street
Buford, Georgia 30518
(678) 541-0790
(678) 541-0789(f)
terry@wmwlaw.com

CAIN INJURY LAW

/s/ Clayton Cain (w/ express permission by TEW)
CLAYTON CAIN
Georgia Bar No. 961772
Attorney for Plaintiffs

521 Scenic Hwy South
Lawrenceville, GA 30046
(678) 377-2246
(678) 377-2245(f)
clayton@caininjurylaw.com